

# **Exhibit B**

IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

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ULKU ROWE,

Plaintiff,

-against-

GOOGLE LLC,

Defendant.

Case No: 19-cv-08655 (JHR)

-----x

October 2, 2023

9:12 a.m.

Videotaped Deposition of NonParty  
Witness PATRICIA FLORISSI, pursuant to Notice,  
before CINDY A. AFANADOR, Certified Shorthand  
Reporter, Registered Professional Reporter,  
Certified Realtime Reporter, Registered Merit  
Reporter, NYSRCR, NYSACR and Notary Public of  
the State of New York.

\*\*THIS TRANSCRIPT CONTAINS CONFIDENTIAL  
PORTIONS DESIGNATED BY COUNSEL\*\*

1 Patricia Florissi

2 A. No -- he signs as a senior  
3 director and I'm assuming that that means he  
4 is a level 9.

5 Q. Did his work change at the time  
6 he got promoted?

7 A. I'm not sure I understand the  
8 question.

9 Q. Sure.

10 A. When you mean --

11 Q. Did his job change at the time  
12 from a level 8 to a 9; did something about his  
13 job change when he got promoted?

14 A. I believe the promotion, again,  
15 to the best of my knowledge, the promotion  
16 happens when you are executing next level's  
17 work, so the reason why he was promoted to  
18 level 9 is because he was doing level 9 work  
19 as a level 8.

20 Q. And what's your basis for your  
21 belief?

22 A. We go through the GARD promotion.  
23 So the promotion cycle, again, we do  
24 peer-reviews and I do not do -- participate on  
25 peer-reviews that a promotion from level 8 to

1 Patricia Florissi

2 level 9. As a level 8 I don't participate. I  
3 don't have a voice on being promoted to  
4 level 9, but I participate on the discussions  
5 of others that are going from let's say --  
6 from other levels that are below level 8.

7 Q. Is it written anywhere that you  
8 know of that to be promoted to level 9 you  
9 have to be executing next level work?

10 A. I think there are a lot of places  
11 that say that. In fact, when you have the two  
12 internally, they ask you is he or she  
13 performing at the level above and there are  
14 four -- four dots that you can specify and the  
15 highest is multiple times, something along  
16 those lines, but it is one of the criteria  
17 that they take into consideration that you are  
18 performing at level 9 or, again, performing at  
19 next level.

20 Q. Where have you seen that written?

21 A. So first of all, we just went to  
22 a promotion meeting last week for someone that  
23 is, again, not going from -- going from other  
24 levels, that I am -- one of them I was the  
25 peer-review and it -- they shared on the